

Environmental Management Consolidated Business Center (EMCBC)

Subject: Operating Experience / Lessons Learned Procedure

Implementation Procedure APPROVED: <u>(Signature on File)</u>

EMCBC Director

ISSUED BY: OFFICE OF LOGISTICS MANAGEMENT

1.0 PURPOSE

The purpose of this procedure is to document a process by which Environmental Management Consolidated Business Center (EMCBC) and the sites supported through Service Level Agreements (SLA) may create a Corporate Operating Experience (COE) / Lessons Learned (LL) procedure to enhance future operations. EMCBC supported sites will share and use this information to: 1) promote the recurrence of desirable events, and 2) prevent the recurrence of undesirable events.

This data will be shared internally and externally, as appropriate, via site Contractors, the EMCBC, SLA supported sites, and/or across the DOE complex.

2.0 SCOPE

This procedure describes the process used by the EMCBC and supported sites to identify, validate, document, and distribute (COE) information which could affect the work at the respective sites, the EMCBC, and/or the DOE complex as a whole.

3.0 APPLICABILITY

This procedure applies to all activities supported by EMCBC.

4.0 REQUIREMENTS and REFERENCES

4.1 Requirements

4.1.1	DEAR 970.5223-1, Integration of Environment, Safety and Health into Work Planning and Execution
4.1.2	DOE O 210.2, DOE Corporate Operating Experience Program
4.1.3	DOE O 226.1A, Implementation of DOE Oversight Program
4.1.4	DOE O 414.1C, Quality Assurance
4.1.5	DOE O 450.1, Environmental Protection Program
4.1.6	DOE P 450.4 - Safety Management System Policy

4.2 References

- 4.2.1 DOE G 450.3-3, Tailoring for Integrated Safety Management Applications
- 4.2.2 DOE G 231.1-1, Occurrence Reporting and Performance Analysis Guide
- 4.2.3 DOE G 231.1-2, Occurrence Reporting Causal Analysis Guide
- 4.2.4 DOE M 231.1-2, Occurrence Reporting and Processing of Operations Information
- 4.2.5 DOE M 450.4-1, Integrated Safety Management System Manual
- 4.2.6 DOE STD-7051-99, "Development of DOE Lessons Learned Programs"
- 4.2.7 DOE-HDBK-7502-95, "Implementing U.S. DOE Lessons Learned Program," Volume I and II
- 4.2.8 EMCBC Procedure IP-414-03, Pegasus Issues and Assessment Reporting

5.0 <u>DEFINITIONS</u>

See DOE O 210.2, DOE Corporate Operating Experience Program

6.0 RESPONSIBILITIES

- 6.1 EMCBC Director Responsible for the following:
 - 6.1.1 Ensuring the implementation of the EMCBC COE Program.
 - 6.1.2 Designating the EMCBC COE Coordinator (COEC).
- 6.2 Assistant Directors and/or Federal Project Director Responsible for the following:
 - 6.2.1 Assisting the EMCBC Director in ensuring the implementation of the ECMBC COE Program *see* DOE O 210.2, Sections 5.e 1 through 15 (Requirement 4.1.2).
 - 6.2.2 Supporting the incorporation of COE into programmatic guidance documents and new and existing training programs.
- 6.3 EMCBC Office of Logistics Management Responsible for the following:
 - 6.3.1 Operation of EMCBC Administrative functions as it pertains to the COE procedure.

- 6.3.2 Ensuring that records generated by this procedure are stored and retained in accordance with EMCBC Records Management Policies and Procedures.
- 6.4 EMCBC Corporate Operating Experience Coordinator Responsible for the following:
 - 6.4.1 Developing and maintaining the EMCBC COE Program and associated EMCBC procedures.
 - 6.4.2 Serving as a point of contact for external organizations, agencies, and EMCBC supported sites.
 - 6.4.3 Providing technical guidance and support of oversight to the Federal Project Directors related to the COE Program.
 - 6.4.4 Coordinating, developing, and transmitting requests for Site Contractor action when deemed necessary by a Subject Matter Expert(s) or the EMCBC Director or Project Director.
 - 6.4.5 Disseminating COE Program products to the EMCBC and supported sites on a regular basis and to other stakeholders, as appropriate.
 - 6.4.6 Communicating to the Associate Director, Office of Logistics Management, any issues, concerns, and corrective actions.
 - 6.4.7 Supporting the assessments of the effectiveness of the COE supported sites programs.
- 6.5 DOE Federal Staff Responsible for the following:
 - 6.5.1 Identifying experiences, activities, processes and practices that should be shared in accordance with the definition of COE (i.e., both positive and negative experiences), and operating experiences.
 - 6.5.2 Contacting and coordinating with Line Management and the EMCBC COEC to determine whether the identified experience qualifies for program inclusion.
 - 6.5.3 Providing information for generation of the COE/LL products and documents. (Use Attachment B Corporate Activity Resource Requests to submit COE/LL data for inclusion to the EMCBC COE/LL Program.)
 - 6.5.4 Reviewing COE documents for applicability and/or implementation with regards to their projects of responsibility.
 - 6.5.5 If determined to be applicable, providing proper distribution to the Site Contractors.

6.5.6 Assisting in verification of COE implementation in the field during regular oversight activities.

7.0 GENERAL INFORMATION

- 7.1 Consistent distribution of COE will provide a feedback and continuous improvement process to identify and respond to both good work practices and potential dangers. This program will help to deter recurrences of negative experiences, emphasize best practices, and spotlight innovative ways to find solutions to specific problems or execute work more safely and efficiently.
- 7.2 The COE Program is a direct link to and implements Integrated Safety Management (ISM) Core Function 5, Provide Feedback and Continuous Improvement.
- 7.3 During the implementation of the COE Program, the seven (7) guiding principles and the five (5) core functions of ISM shall be incorporated, as appropriate. ISM requires both DOE and the Site Contractor to systematically unify safety into management and work practices at all levels, so that the mission is accomplished while protecting the public, the worker, and the environment.
- 7.4 It is expected that the communication and use of COE will be part of every work/organizational activity of the EMCBC. This is not purely a safety related support mechanism but a tool to be used for continuous improvement across all organizational lines.
- 7.5 DOE-STD-7501-99, The DOE Corporate Lessons Learned Program (Reference 4.2.6), contains assessment criteria for six (6) major program elements at several levels of development, from first implementation through steady-state, established functioning. This guide, found in Appendix C of the Standard, may be used for evaluations of the status of the Site Contractors LL Program or may be used as an example to develop criteria to evaluate the same.
- 7.6 LL bulletins developed under this program are distributed using various methods, mainly the EMCBC electronic mail system and the DOE Office of Health, Safety, and Security webpage (www.hss.energy.gov/CSA/ANALYSIS).
- 7.7 LL should communicate only lessons, and should not duplicate nor replace other management information functions like self assessment or event investigations and corrective action systems.
- 7.8 The LL information provided by the DOE complex through the Society for Effective Lessons Learned Sharing (SELLS) list server will be provided simultaneously to the Site Contractors. SELLS is a volunteer organization comprised of various DOE programs, Operations Offices, sites, and Contractors. SELLS shares the common goal of improving the information exchange across the DOE complex and with other public and private organizations.

8.0 PROCEDURE

- 8.1 Prior to input into the EMCBC COE/LL Program, evaluate the Site Contractor LL to identify the information used to create a LL bulletin. The LL bulletin may come from any reliable source, including DOE Federal Staff and the Site Contractor, other DOE sites, facilities or offices, other government agencies, industry or professional organizations.
 - 8.1.1 LL Internal information sources used to generate LL may include, but are not limited to, the following:

NOTE: All Personally Identifiable Information (PII) must be expunged from the documents and reports listed below prior to their entry into the Pegasus System or incorporation into any document intended for distribution.

- Personal experiences;
- Field activities (work in progress);
- o Occurrence Reports;
- Assessments, audits, self-assessments, and appraisals;
- o Safety Observer Program;
- o Training Department observations and evaluations;
- Quality Assurance deficiency documents (e.g., nonconformance reports, surveillance reports);
- o Operational Readiness Reviews;
- Performance measurement and trending;
- Critique Minutes, causal analyses, and investigations;
- Medical reports;
- o Industrial, Safety and Health reviews and reports;
- o Radiation Protection deficiency reports and reviews;
- Conduct of Operations "Walk Your Spaces" Tours; and
- Positive events or practices as submitted or extracted from critiques, newsletters, or other internal publications; and
- o Integrated Safety Management System reviews.

- 8.1.2 LL External information sources for LL may include, but are not limited to the following:
 - LL Bulletins from other DOE sites (available from the DOE LL List Server);
 - o DOE Safety Notices, ES&H Alerts, DOE Safety Alerts;
 - Operational Experience Weekly Summaries;
 - o ES&H Bulletins;
 - Occurrence Reports;
 - Assessments/audits/appraisals;
 - o Industry alerts, cautions, and warnings;
 - o Regulator alerts and Notices of Violation (e.g., State, Federal);
 - Manufacturer and Consumer Product Safety Commission material on recalls, warnings;
 - Significant events whose investigations are in progress, but situation update information is available;
 - o Type A and B Accident Investigation Reports;
 - o DNFSB trip reports and recommendations; and
 - NRC documents, including daily reports, information notices, and licensee event reports.
- 8.2 If a potential LL is identified (based on an internal or external experience) by the EMCBC or Federal Staff and is not the result of Small Project activities:
 - 8.2.1 The potential LL shall be communicated to the EMCBC COEC. Use Attachment B, Corporate Activity Resource Requests to submit COE/LL data for inclusion to the EMCBC COE/LL Program.
 - 8.2.2 The EMCBC COEC, with assistance of appropriate Subject Matter Experts, shall review and evaluate the potential LL for applicability to the EMCBC and supported sites;
 - 8.2.3 The EMCBC COEC shall document the LL in the Pegasus Database and ensure required response actions, if any, are being taken by the appropriate Federal staff. The Pegasus System includes a Lessons Learned Data Entry

- Screen requiring the following fields to be completed; Title, Lesson Statement, Discussion, Analysis, Recommended Actions, Priority, DOE Function/Work Category, Hazards and Comments.
- 8.2.4 The EMCBC COEC shall ensure the widest possible dissemination of the LL to EMCBC Staff using the Pegasus System and support dissemination to supported sites using other available mechanisms on a regular basis, as appropriate.
- 8.3 If a potential LL is identified (based on an internal or external experience) by Supported Site Staff and or the EMCBC staff during support activities to the specific supported site:
 - 8.3.1 The EMCBC COEC, with the assistance of Subject Matter Experts from the site, shall review and evaluate the potential LL for applicability to the site;
 - 8.3.2 The EMCBC COEC and the appropriate site personnel shall develop surveillance or communication documents, as needed, directed to appropriate site personnel for action when LL information has an impact or potentially has an impact on DOE Programs. The Pegasus System includes a Lessons Learned Data Entry Screen requiring the following fields to be completed; Title, Lesson Statement, Discussion, Analysis, Recommended Actions, Priority, DOE Function/Work Category Hazards and Comments;
 - 8.3.3 If Action Items (Issues) result from a LL, the action discussed in 8.3.2 shall be entered into the Pegasus System and Tracked through closure;
 - 8.3.4 The supported sites, with assistance from the EMCBC staff, as requested, will ensure closure of the issue in accordance with established site policies and procedures. Closure of the Issue in Pegasus will be coordinated by the Issue Owner. (See Reference 4.2.8).

9.0 RECORDS MAINTENANCE

- 9.1 The following records are generated as a result of this procedure:
 - 9.1.1 Documentation of the evaluation of the supported Site Contractor LL Program, specified in Section 8.1.
 - 9.1.2 Transmittals to and from Federal Project Staff to Site Contractor requesting action when deemed necessary.
- 9.2 LL records requiring action commitment tracking shall use the EMCBC Pegasus Issues and Assessment Reporting Procedure (reference 4.2.8).

9.3 All records generated as a result of this procedure shall be prepared, maintained, and stored in accordance with EMCBC or project specific records manual and file plans.

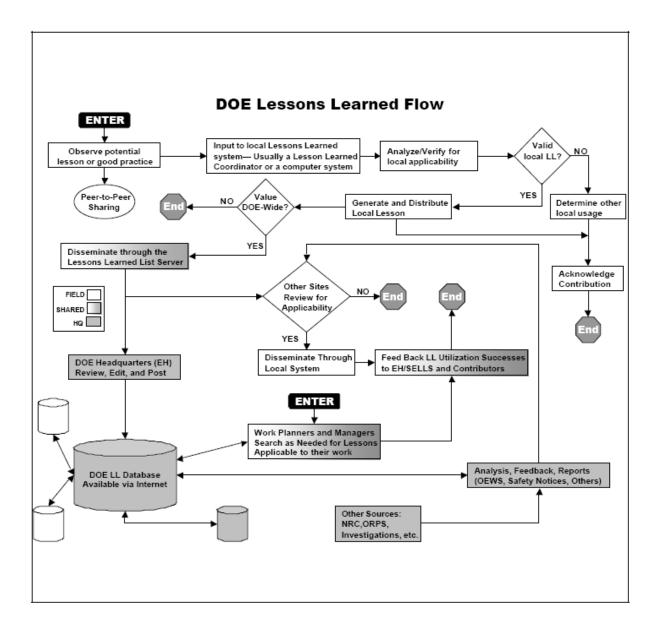
10.0 FORMS USED

- 10.1 *See Attachment B* Corporate Activity Resource Request
- 10.2 EMCBC Record of revision, IP-250-01-F3, Rev. 2

11.0 ATTACHMENTS

- 11.1 Attachment A "DOE Corporate Lessons Learned System Diagram."
- 11.2 Attachment B "Corporate Activity Resource Request"
- 11.3 Attachment C "EMCBC Record of Revision," IP-250-01-F3, Rev. 2

Attachment A DOE Corporate Lessons Learned System Diagram



Attachment B Corporate Activity Resource Request Form

CORPORATE ACTIVITIY RESOURCE REQUEST

From:	
Description of Task:	
Deliverables:	
Timeframe:	
imeiranie:	
Project Description (assignment context) and Skill/Exp	perience:
Activity/Task Supervisor:	
Federal Project Director (if applicable):	
Assignment Completion	n Evaluation
Employee Name:	
Activity/Task:	
Completion: Yes No	Timeframes Met: Yes No
Level of effort: Outstanding Very Good Unsatisfactory	Satisfactory
Additional Comments:	
On-Site Supervisor:	Date:

Attachment C

EMCBC RECORD OF REVISION

DOCUMENT

If there are changes to the controlled document, the revision number increases by one. Indicate changes by one of the following:

- l Placing a vertical black line in the margin adjacent to sentence or paragraph that was revised.
- l Placing the words GENERAL REVISION at the beginning of the text.

Rev. No.	Description of Changes	Revision on Pages	Date	_
1	Original Procedure	All	11/19/07	